

Sage Legal LLC

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November 29, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Vera M. Scanlon, U.S.M.J.
225 Cadman Plaza East
Courtroom 13A South
Brooklyn, NY 11201-1804

Re: Sanchez v. EZ Parking Corp., et al.
Case No.: 1:23-cv-4052 (AMD) (VMS)

Dear Judge Scanlon:

This firm represents Defendant EK Premier Services LLC (“EK Premier”) in the above-referenced case. EK Premier writes to respectfully request an extension of time of ninety (90) days to complete discovery, take the first step in dispositive motion practice, and to file the joint pretrial Order.

Pursuant to ¶ II(b) of this Court’s Individual Practice Rules, EK Premier respectfully submits that:

(i) the original dates of the foregoing deadlines are September 30, 2024, October 31, 2024, and November 29, 2024 respectively;

(ii) there have three (3) previous requests to extend these deadlines, all of which have been granted;

(iii) the Plaintiff takes no position on the requested extension of time to complete discovery and take the first step in dispositive motion practice, and joins in the motion for an extension of time to file the joint pretrial Order;

(iv) the reason for the request is because the parties await a ruling on the pending discovery motion and are engaging in post-deposition discovery;

(v) no suggested adjournment dates are necessary for this request; and

(vi) the parties are prepared to submit a proposed amended scheduling Order to the extent this Court finds same necessary.

In light of the foregoing, EK Premier respectfully submit that both good cause and excusable neglect exists sufficient for this Court to exercise its discretion in favor of granting the requested extensions of time. See Fed. R. Civ. P. 6(b)(1)(B).

Defendant thanks this Court for its time and attention to this case.

Dated: Jamaica, New York
November 29, 2024

Respectfully submitted,

SAGE LEGAL LLC

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